



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAJ:SDD/SA
F.#2009R01764

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Via Email and ECF

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Re: United States v. Betim Kaziu
Criminal Docket No. 06-660 (JG)

Dear Sirs:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, please be advised that the government intends to call Evan Kohlmann as an expert witness at trial.

As set forth in greater detail in the enclosed draft expert report, Mr. Kohlmann is a private international terrorism consultant, who specializes in tracking al-Qaeda and other contemporary terrorist movements. He holds a degree in International Politics from the Edmund A. Walsh School of Foreign Service (Georgetown University), and a Juris Doctor (professional law degree) from the University of Pennsylvania Law School. Mr. Kohlmann is the recipient of a certificate in Islamic studies from the Prince Alwaleed bin Talal Center for Muslim-Christian Understanding at Georgetown University. He currently works as an investigator with the NEFA Foundation and as an on-air analyst for NBC News in the United States.

In addition, Mr. Kohlmann runs the Internet website Globalterroralert.com, which provides information to the general public relating to international terrorism, and is the author of the book *Al-Qaida's Jihad in Europe: the Afghan-Bosnian Network*. Mr. Kohlmann has previously been qualified as an expert on the subject of Islamic extremism and the use of electronic media by terrorists and foreign terrorist organizations. He has testified as an expert witness in numerous proceedings relating to terrorism.

In connection with the trial in the above-referenced case, we anticipate that Mr. Kohlmann will testify as to the background and significance of certain terrorists and terrorist organizations, which are featured in electronic media that were recovered from the defendant's laptop computer. For example, we expect that Mr. Kohlmann will testify that certain materials on the defendant's laptop were created by the propaganda wings of foreign terrorist organizations, including al-Qaeda, al-Shabaab and the Islamic Army of the Caucasus. Mr. Kohlmann will explain the significance of this material in the context of global terrorism, including material which appears to have been created and/or transcribed by the defendant himself.

We also expect that Mr. Kohlmann will testify as to the dates that certain extremist propaganda materials were first published by foreign terrorist organizations, as well as the dates that certain electronic media were accessed on the defendant's laptop computer. In addition, we expect that Mr. Kohlmann will testify as to the common meaning and usage of jihadist terminology.

We further expect that Mr. Kohlmann will testify regarding how terrorists use propaganda to recruit personnel into their mission to promote violent, global jihad, and how knowledge of such propaganda materials facilitates the operational, cultural and social assimilation of foreign fighters into jihadist groups operating abroad. Mr. Kohlmann currently is in the process of making additions and revisions to the enclosed draft expert report, which sets forth the general subject matter of his anticipated testimony in greater detail. We will timely provide you with a final version of the report before trial.

The government reserves the right to call a substitute expert witness, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so. If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

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cc: Clerk of Court (JG w/o enclosure) (by ECF)